

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST by and through its Co-Directors Natasha Soto and Shaketa Redden and on behalf of its members; DORETREA FRANKLIN; TANIQUA SIMMONS; DE'JON HALL; JOSEPH BONDS; CHARLES PALMER; SHIRLEY SARMIENTO; EBONY YELDON; and JANE DOE, individually and on behalf of a class of all others similarly situated;

Plaintiffs,

v.

Civil No.: 1:18-cv-00719-CCR

CITY OF BUFFALO, NY; BYRON B. BROWN, Mayor of the City of Buffalo, in his individual and official capacities; BYRON C. LOCKWOOD, Commissioner of the Buffalo Police Department, in his individual and official capacities; DANIEL DERENDA, former Commissioner of the Buffalo Police Department, in his individual capacity; AARON YOUNG, KEVIN BRINKWORTH, PHILIP SERAFINI, ROBBIN THOMAS, UNKNOWN SUPERVISORY PERSONNEL 1-10, UNKNOWN OFFICERS 1-20, each officers of the Buffalo Police Department, in their individual capacities.

Defendants.

NOTICE OF MOTION FOR SUMMARY JUDGMENT

Nature of Action: Civil Rights.

Moving Party: Defendants, the City of Buffalo; Byron B. Brown; Byron C. Lockwood; Daniel Derenda; Aaron Young; Kevin Brinkworth; Philip Serafini; Robbin Thomas; Unknown Supervisory Personnel 1-10; and Unknown Officers 1-20.

Directed To: Chief District Judge Christina Reiss.

Date and Time: At a date and time to be determined by the Court.

Place: United States Courthouse, 2 Niagara Square, Buffalo, New York, 14202.

Supporting Papers: Declaration of Peter A. Sahasrabudhe dated February 7, 2025, with Exhibits 1-43; Statement of Undisputed Facts, dated February 7, 2025; and Memorandum of Law in Support of Defendants' Motion for Summary Judgment, dated February 7, 2025.

Answering Papers: Pursuant to Court's Order adjourning deadlines in the Case Management Order, the opposing party is required to file and serve answering papers, if any, on or before April 8, 2025. The moving party must file reply papers on or before May 8, 2025. .

Relief Requested: An order of summary judgment dismissing each of the claims asserted against the Defendants with prejudice, and such further and additional relief as this Court deems just and proper.

Grounds for Relief: Fed. R. Civ. P. 56.

Oral Argument: Requested.

Dated: February 7, 2025

HODGSON RUSS LLP

Attorneys for Defendants City of Buffalo, NY, Byron B. Brown, Byron C. Lockwood, Daniel Derenda, Aaron Young, Kevin Brinkworth, Philip Serafini, Robbin Thomas, Unknown Supervisory Personnel 1-10, and Unknown Officers 1-20

By: /s/ Peter A. Sahasrabudhe

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